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Freedom Mortgage Corporation

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TIFFANY KEITH and STEVEN KEITH,

Plaintiffs,

v.

TRANS UNION LLC; EQUIFAX  
INFORMATION SYSTEMS, LLC; and  
FREEDOM MORTGAGE CORPORATION,

Defendants.

CASE NO.: 2:22-cv-00059-RFB-DJA

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR  
FREEDOM MORTGAGE  
CORPORATION TO RESPOND TO  
COMPLAINT**

**(First Request)**

Plaintiffs Tiffany Keith and Steven Keith (“Plaintiffs”) and Defendant Freedom Mortgage Corporation (“Freedom”), by and through their respective undersigned counsel, hereby stipulate and agree that Freedom shall have an extension of time until March 8, 2022, in which to respond to Plaintiffs’ complaint.

This is the first stipulation for extension of time to respond to the complaint. Nothing in

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1 this Stipulation and Order is intended to be, or will be, construed as an admission of the claims  
 2 or defenses of the parties. This Stipulation is made in good faith in an effort to enable Freedom  
 3 fully explore the allegations in the complaint.  
 4

5 DATED this 7<sup>th</sup> day of February, 2022.

6 SMITH LARSEN & WIXOM

7 /s/ Karl L. Nielson

8 Karl L. Nielson, Esq.  
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 12 And  
 13 Gregg D. Stevens, Esq.  
 14 (*Pro Hac Vice* forthcoming)  
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 18 Attorneys for Defendant  
 19 Freedom Mortgage Corporation  
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DATED this 7<sup>th</sup> day of February, 2022.

PRICE LAW GROUP, APC

/s/ Steven A. Alpert

Steven A. Alpert, Esq.  
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 Tiffany and Steven Keith

**IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE

DATED: February 7, 2022